

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

RUSSELL MARTINEZ,

Plaintiff,

Case No. 14-cv-00534 KG/WPL

vs.

JOSEPH SALAZAR, et al.,

Defendants.

**PLAINTIFF'S NOTICE OF ERRATA TO  
MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND  
PRODUCTION OF DOCUMENTS, FOR ATTORNEY'S FEES, AND FOR SANCTIONS**

TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the following errors were inadvertently made in Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents, for Attorney's Fees, and for Sanctions (Doc. 46), and that Plaintiff requests the Court to accept the following corrections to that motion:

1. The quotation of RFP No. 11 on page 2 of the motion should read: "all documents evidencing any type of grievance, complaint, internal affairs investigation, or disciplinary action involving Defendants Joseph Salazar or Greg Esparza";
2. The heading for Section I of the Argument on page 5 of the motion should read: "Defendants Salazar and Montoya Should Be Compelled to Answer Interrogatories Numbered 2-9 and 18-28";
3. The reference on page 5 of the motion to the total number of interrogatories not answered by Defendants Salazar and Montoya should be "19," not "18";
4. The reference on page 5 of the motion to the numbered interrogatories that Defendant Salazar purportedly could not answer should be "3 through 9," not "3 through 8"; and

5. The reference on page 6 of the motion to the numbered interrogatories to which Defendant Salazar has not provided any response should be “3, 8, and 9,” not “3 and 8.”

Respectfully submitted,

COBERLY LAW OFFICE

/s/ Todd A. Coberly

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of January, 2015, I filed the foregoing pleading using the CM/ECF system, which will electronically send notification of such filing to all counsel of record.

/s/ Todd A. Coberly

Todd A. Coberly